

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

BERNADETTE WILLIAMS, RICK
MCCONNELL, IVAN SERRATA REYES,
ROSILYN WILSON, LINDA LEWIS,
LATASHA HUFF, HAUNANIMAE
CERVANTES-WHITE, MARIA MUNOZ,
TRACY OBRIEN, KIMBERLY BENSON,
ROY TUINSTRA, EVELYN BROWN,
MICHELLE SNYDER, PATRICIA COUCH,
SABRINA CAPERS, WILLIAM ROSS
DEAN, RICHARD DACHEFF, KRISTY
KELLER, JASIMEN HERNANDEZ,
EDGAR FLORIAN, MICHAEL
GROSSBERG, MERRILL LOVE, DIANE
NEWKIRK, SANDRA SMILING, DAVEY
JOHNSTON, CYNTHIA ROEMER, SHAUN
ROBERT, ROQUE ESPINOZA, JENNIFER
PAYNE, LATISHIA BOWDEN, and DJ
NEILL, TYSON DEWSNUP, and DEIRDRE
PALMER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE CO.,

Defendant.

Case No.: 1:22-cv-01422

Judge Virginia M. Kendall

PLAINTIFFS' MOTION TO COMPEL DISCOVERY

Plaintiffs, by and through undersigned counsel, hereby move the Court for an order compelling Defendant to (1) produce documents from related litigation; (2) respond to discovery and produce documents concerning Defendant's knowledge and adoption of a "typical negotiation adjustment" to fraudulently and unlawfully reduce its payments owed to insureds; and (3) cooperate in the disclosure of all potential custodians and data sources of potentially relevant information.

For the reasons described in the accompanying memorandum in support, Plaintiffs' Motion to Compel should be granted.

Dated: March 1, 2024

Respectfully submitted,

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By: /s/ Andrew J. Shamis

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Attorneys for Plaintiffs and the Putative Class

CERTIFICATE OF SERVICE

I, Andrew Shamis, hereby certify that on this date, March 1, 2024, I caused the foregoing *Motion to Compel Discovery* to be filed with the Clerk of the Court via the Court's CM/ECF system, which will provide electronic mail notice to all counsel of record.

/s/Andrew J. Shamis
Andrew J. Shamis, Esq.